

Exhibit 7

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 1:21-cv-08655 (JHR)

**DECLARATION OF DAVID SANFORD IN SUPPORT OF PLAINTIFF’S MOTION
FOR REASONABLE ATTORNEYS’ FEES AND COSTS**

I, David Sanford, hereby declare as follows:

1. I am over eighteen years of age and am competent to make this declaration.
2. I am an attorney duly licensed to practice law in the State of New York and the Southern District of New York. I make this Declaration in support of Plaintiff’s Motion for Attorneys’ Fees and Costs based upon personal knowledge. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.

GENERAL BACKGROUND AND EXPERIENCE

3. I am a founding partner and the Chairman of Sanford Heisler Sharp, LLP (“Sanford Heisler Sharp”), a leading plaintiffs’ firm dedicated primarily to civil rights and employment litigation matters. The Firm has expertise in complex employment matters and exclusively represents plaintiffs in these cases.

4. I graduated from Stanford Law School in 1995. I was a law clerk for Judge Gladys Kessler of the United States District Court for the District of Columbia from 1995 through 1996. I am a member of the Maryland State bar, the District of Columbia bar, and the

New York bar. I am admitted to the U.S. District Courts for the Southern District of New York, the District of Maryland, the District of Columbia, the Northern District of Florida, and the Central District of Illinois, as well as the U.S. Courts of Appeals for the First, Second, and Seventh Circuits and the District of Columbia, and the United States Supreme Court.

5. Since 2001, I have obtained hundreds of individual settlements and over 30 class action settlements in employment matters, and I have recovered more than one billion dollars for individual clients and the United States government. I am currently serving as lead counsel in numerous individual, class, and qui tam matters. I was lead class counsel and lead trial counsel in *Velez et al. v. Novartis Pharmaceuticals Corp.*, which resulted in the largest verdict in a Title VII discrimination class action in United States history.

6. I was inducted into the National Law Journal's Elite Trial Lawyers Hall of Fame and am listed among the top 100 trial lawyers in America by the National Trial Lawyers. I have been recognized as the 2019 "Labor and Employment Attorney of the Year" by Benchmark Litigation; as a "Plaintiffs' Lawyer Trailblazer" by National Law Journal; as a "Leading Plaintiff Employment Lawyer" by Lawdragon; as a "Top Employment Lawyer" by American Lawyer, Corporate Counsel, and the National Law Journal; and as an Employment MVP (for four years, including in 2018) and "Titan of the Plaintiffs' Bar" (in 2014 and 2018) by Law360. In 2018, I was one of just three lawyers nationwide selected as a finalist for the Lawyer of the Year award by American Lawyer. In addition, I have been rated "Band One" by Chambers and recognized as a "Super Lawyer" in both Washington, D.C. and New York. Since 2006, I have been AV-rated by Martindale-Hubbell, which is the highest rating awarded to an attorney by judges and attorneys throughout the United States.

7. I founded Sanford Heisler Sharp in 2004. Sanford Heisler Sharp employs

approximately 60 lawyers. The Firm employs legal professionals who are exceptionally accomplished and well-educated, including many who have graduated from the country's best undergraduate and law schools; in addition, many of the Firm's attorneys have completed prestigious clerkships. In recognition of the high caliber of Sanford Heisler Sharp's lawyers, the Firm has been recognized by Above the Law as one of the "Top Litigation Firms by Law School Pedigree."

8. Sanford Heisler Sharp has served as counsel for plaintiffs in numerous groundbreaking gender discrimination actions, including *Campbell et al. v. Chadbourne & Parke LLP*, No. 1:16-cv-06832 (S.D.N.Y.) (\$3.1 million settlement of Equal Pay Act claims); *Dickerson et al. v. Novartis Corp. et al.*, No. 15-CV-1980 (S.D.N.Y.) (\$8 million class settlement in gender discrimination class case); *Wellens et al. v. Daiichi Sankyo, Inc.*, No. C 13-00581 (N.D. Cal.) (\$8.2 million class settlement in gender discrimination case); *Barrett et al. v. Forest Laboratories, Inc. et al.*, No. 1:12-cv-05224-RA (S.D.N.Y.) (\$4 million class settlement in gender discrimination class action for pay, promotion, and pregnancy discrimination claims); *Smith et al. v. Merck & Co., Inc.*, No. 3:13-cv-02970 (D.N.J.) (\$6.2 million class settlement involving pay, promotion, and pregnancy discrimination claims).

9. Among the many accolades the Firm has received, Sanford Heisler Sharp has been recognized as an "AV" rated firm, the "Employment Group of the Year" by Law360 (2016 and 2018), the "Best Law Firm National Tier 1 Employment Firm" by U.S. News & World Report (2016 to 2019), and "Elite Trial Lawyers" by the National Law Journal (2014, 2015, and 2019).

KNOWLEDGE OF MARKET RATES IN THIS DISTRICT

10. Based on my experience in practice, I am familiar with hourly rates charged by

attorneys handling complex cases such as this one in New York City. I routinely read published data on the rates charged by a variety of law firms. I am familiar with the rates charged by Sanford Heisler Sharp lawyers in New York, both on matters I have directly supervised and otherwise.

11. My firm reviews and adjusts our standard hourly rates on an annual basis. My hourly rate in 2023 is \$1600. This hourly rate is the standard rate I charge for all hourly work.

12. Based on my familiarity with rates generally charged in New York City, including the rates charged by attorneys in Sanford Heisler Sharp's New York office, I believe that my hourly rate is comparable to the currently prevailing rates charged by very senior New York attorneys of similar skill, qualifications, experience, and reputation in matters involving a degree of similar complexity.

13. In 2023 the firm's hourly rate for a litigation fellow in our New York City office who graduated from law school in 2022 is \$500; for a mid-level associate who graduated in 2018 it is \$600; for junior partners who graduated between 2012 and 2016 the hourly rates range from \$900 to \$1000; and for senior partners who graduated from 2010 to 1992 (and earlier) the hourly rates range from \$1,100 to \$1400. The firm's hourly clients regularly accept and pay Sanford Heisler Sharp's hourly rates. In my experience, my firm's hourly rates are within market rates for experienced, highly-regarded attorneys in the civil rights, employment law, and class action fields in New York City.

14. The experience described above has also given me a familiarity with the hourly rates charged by Sanford Heisler Sharp and other New York law firms for the services performed by paralegals and law clerks on matters having a degree of complexity comparable to this case.

15. In 2023, my firm's rate for senior legal assistants is \$325 per hour and for junior

legal assistants is \$300 per hour. Sanford Heisler Sharp's hourly clients regularly accept and pay these rates.

16. Sanford Heisler Sharp's rates have been upheld as reasonable by numerous courts. *See, e.g., Chen v. Western Digital Corp.*, No. 8:19-cv-909, Dkt. 90 at 16-17 (C.D. Cal. Jan. 5, 2021) (approving Sanford Heisler Sharp's 2020 fee schedule, including Partner rates up to \$1,200, Senior Litigation Counsel rate of \$750, Associate rates of \$500 based on class year, Litigation Fellow rate of \$400, and Legal Assistant rates from \$275-\$295); *Jane Doe 2 v. The Georgetown Synagogue et al.*, Civil Action No. 2014 CAB 8073 (D.C. Super. Ct. 2018) (awarding rates ranging from \$425-\$500 per hour for associates and litigation fellows, \$850 per hour for a partner who graduated in 2009, and \$1,200 per hour for myself); *Wellens v. Sankyo*, No. C 13-00581WHO(DMR), 2016 WL 8115715, at *3 (N.D. Cal. Feb. 11, 2016) (approving SHS's Jan. 2016 rates under the lodestar method—\$850-\$1050 for partners, \$700 for Senior Litigation Counsel, \$400-\$575 for Associates based on class year, and \$275-\$295 for Legal Assistants. I note that all of the rates mentioned here apply to awards made three or more years ago, when rates were lower.

OUTTEN & GOLDEN'S BILLING RATES ARE REASONABLE

17. I understand that Plaintiff is represented in this case by Outten & Golden LLP, and I understand that Outten & Golden LLP's partner rates typically range from \$650/hour to \$1,500/hour. I further understand that in this case, Outten & Golden is seeking hourly rates of (i) \$800-\$950 for the two partners on the case, Cara Greene and Gregory Chiarello, who are 2005 and 2006 law school graduates, respectively; (ii) \$375-\$475 for associates; and (iii) \$285-\$350 for paralegals and litigation support staff.

18. I have known Wayne Outten, the Chair and founder of Outten & Golden, for

many years. I am familiar with his firm's expertise and the high quality of its practice in civil rights and employment discrimination litigation. The firm and its partners have an excellent reputation for providing high quality representation for their clients.

19. Based on my familiarity with Outten & Golden and the rates our firm and other firms charge in the New York metropolitan area, it is my opinion that the rates sought in this matter by their attorneys and paralegals are entirely reasonable and appropriate in this marketplace and are well within (and below) the market rates for this type of matter. At my firm, the partner rates would likely be \$1,100 per hour.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, and belief.

Executed on this 21st day of November 2023.



David Sanford